

**REMARKS**

Claims 1, 2, 4 through 7, 11 through 21, 23 through 25 and 29 through 36 are currently pending in the application.

Claims 1, 2, 4 through 7, 11 through 21, 23 through 25, and 29 through 36 stand rejected.

Applicants propose to amend claims 1, 5, 17, 19, 23, and 35, and respectfully request reconsideration of the application as proposed to be amended herein.

**35 U.S.C. § 102(b) Anticipation Rejections**

**Anticipation Rejection Based on U.S. Patent 4,992,850 to Corbett et al.**

Claims 1, 2, 4 through 7, 11 through 21, 23 through 25, and 29 through 36 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Corbett et al. (U.S. Patent 4,992,850).

Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.

*Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

After carefully considering the cited prior art, the rejections, and the Examiner's comments, Applicants have amended the claimed inventions to clearly distinguish over the cited prior art.

Applicants assert that the inventions of presently amended independent claims 1, 5, 17, 19, 23, and 35 are not anticipated under 35 U.S.C. § 102 by the Corbett et al. reference because the Corbett et al. reference does not identically describe, either expressly or inherently, each and every element of the presently claimed inventions in as complete detail as is contained in the claims.

Turning to the Corbett et al. reference, described therein is a leadframe interconnect package that is tape automated bond (TAB) bonded to circuitry on the chip and which provides a circuit connection for subsequent connection to a printed circuit board. The encapsulated chips will replace both the lead frame and printed circuit board in a conventional SIMM module. The Corbett et al. reference does not describe whatsoever a known-good-die semiconductor device used therein.

Applicants assert that the Corbett et al. reference fails to describe, either expressly or inherently, the elements of the claimed inventions of presently amended independent claims 1, 5, 17, 19, 23, and 25 calling for “a second known-good-die located at the at least one other vacant position” and “a second known-good-die semiconductor device located in the second position of the substrate for use in the multi-chip module system, the second semiconductor device having a second predetermined performance characteristic; said first and second semiconductor devices have been burned in at said first and second positions, respectively, on said substrate”. In contrast to the elements of the presently claimed inventions of presently amended independent claims 1, 5, 17, 19, 23, and 25, Applicants assert that the Corbett et al. reference is absent any description of a vacant position for a semiconductor device except after a defective semiconductor device has been removed therefrom and does not describe a known-good-die. The presently claimed inventions of presently amended claims 1, 5, 17, 19, 23, and 25 are not described whatsoever by the Corbett et al. reference, either expressly or inherently.

Therefore, Applicants assert that presently amended independent claims 1, 5, 17, 19, 23, and 25 are allowable as well as the currently pending dependent claims therefrom.

Applicants request entry of this amendment for the following reasons:

The amendment is timely filed.

The amendment places the application in condition for allowance.

The amendment does not require any further search or consideration.

In summary for the reasons set forth herein, Applicants submit that claims 1, 2, 4 through 7, 11 through 21, 23 through 25, and 29 through 36 are clearly allowable over the cited prior art.

Applicants request the entry of this amendment, the allowance of claims 1, 2, 4 through 7, 11 through 21, 23 through 25, and 29 through 36, and the case passed for issue.

### ENTRY OF AMENDMENTS

The proposed amendments to claims 1, 5, 17, 19, 23, and 35 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application. Further, the amendments do not raise new issues or require a further search. Finally, if the Examiner determines that the amendments do not place the application in condition for allowance, entry is respectfully requested upon filing of a Notice of Appeal herein.

### CONCLUSION

Claims 1, 2, 4 through 7, 11 through 21, 23 through 25 and 29 through 36 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicants' undersigned attorney.

Respectfully submitted,



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